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Pro Se



UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Julie Ianello)	Case No.: 08-13555 (SCC)
)	
)	
vs)	(Jointly Administered)
)	
)	
Lehman Brothers Holdings Inc., et al,)	
)	
)	
Debtors)	

**OBJECTION TO THE MOTION OF PLAN ADMINISTRATOR FOR AN ORDER IN
AID OF EXECUTION OF THE MODIFIED THIRD AMENDED CHAPTER 11 PLAN
OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS**

**OBJECTION TO PROPOSED ORDER IN AID OF EXECUTION OF THE MODIFIED
THIRD AMENDED CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS
INC. AND ITS AFFILIATED DEBTORS**

**TO THE HONORABLE SHELLEY C CHAPMAN
UNITED STATES BANKRUPTCY JUDGE**

Julie Ianello, as pro se, files this objection to "NOTICE OF PRESENTMENT OF MOTION OF
PLAN ADMINISTRATOR FOR AN ORDER IN AID OF EXECUTION OF THE MODIFIED
THIRD AMENDED JOINT CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS
INC. AND ITS AFFILIATED DEBTORS," and the "PROPOSED ORDER IN AID OF

EXECUTION OF THE MODIFIED THIRD AMENDED CHAPTER 11 PLAN OF LEHMAN
BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS” filed by the Plan

Administrator (Docket # 59756) and respectfully states:

1. The Debtor is pursuing an early distribution because the debtor wants to avoid paying the LBHI Capital Trust 3, 4, 5 and 6 preferred share holders once the "floodgates" are opened. The debtor used "floodgates" in his objection to motion docket # 59614. Rex Wu states correctly that doing the right thing and getting the largest bankruptcy in US history correct is with utmost importance. The Debtor should enforce the Plan of Reorganization and not go around it. The Debtor wants to avoid their responsibility to pay the 4 Capital Trust shareholders by setting the Record Date to June 17th, two days before the Hearing for Docket #59614.
2. The LBHI Capital Trust shareholders should be given the chance to contact their trustee to enforce the Guarantee globally.
3. The Plan Administrator requests authority to establish July 18, 2019, as a distribution date to distribute available cash to debtors' creditors, and to establish June 17, 2019 as a Record Date for such distribution. The Record Date is 2 days before the Hearing Date for “Motion for an Order Enforcing the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors for Purposes of Distributions” (Docket # 59614), filed by Rex Wu and joined by Julie Ianello (Docket # 59736).
4. A hearing is scheduled on Rex Wu’s motion (Docket # 59614) joined by Julie Ianello (Docket # 59736) on May 23, 2019. The June 17, 2019 Record Date has an adverse and

detrimental effect in regards to the timing of Rex Wu's motion. The Record Date of June 17, 2019 will result in Julie Ianello missing the early distribution should the ruling on motion docket # 59614 be ruled in her and Rex Wu's favor.

5. Plan administrator presents no valid and compelling reason to advance the date of the distribution. Plan administrator offers a vague claim of additional available cash.
6. Therefore the motion and order proposed by Plan Administrator should be rejected by the court.

Wherefore, Julie Ianello respectfully requests the Honorable Court to grant her objections and deny the "MOTION OF PLAN ADMINISTRATOR FOR AN ORDER IN AID OF EXECUTION OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS," and the "PROPOSED ORDER IN AID OF EXECUTION OF THE MODIFIED THIRD AMENDED CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS" filed by the Plan Administrator.

Respectfully Submitted

Dated this 15th day of June, 2019



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Julie Ianello)	Case No.: 08-13555 (SCC)
)	
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vs)	(Jointly Administered)
)	
)	
Lehman Brothers Holdings Inc., et al,)	Ref. Docket # 59756
)	
)	
Debtors)	

PROOF OF SERVICE

On June 15th, 2019, I caused to be served the "**JULIE IANELLO'S OBJECTION TO THE MOTION OF PLAN ADMINISTRATOR FOR AN ORDER IN AID OF EXECUTION OF THE MODIFIED THIRD AMENDED CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS AND OBJECTION TO PROPOSED ORDER IN AID OF EXECUTION OF THE MODIFIED THIRD AMENDED CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS,**" Docket #59756, by causing true and correct copies to be enclosed securely in a separate postage paid envelope and delivered via priority mail to Attention: Kristine Dickson and Matthew Cantor, c/o Lehman Brothers Holdings Inc., 277 Park Avenue, 46th floor, New York, New York 10172.
(Exhibit A)

Respectfully Submitted

Dated this 15th day of June, 2019


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The UPS Store - #1097
2043 South Bend Ave
South Bend, IN 46637
(574) 277-6245

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001 001005 (001) TO \$ 42.07
NDA
Tracking# 1Z6R6E580138509708
002 001005 (001) TO \$ 42.07
NDA
Tracking# 1Z6R6E580105179038

SubTotal \$ 84.14
Total \$ 84.14

VISA CREDIT \$ 84.14

ACCOUNT NUMBER * *****2967
Appr Code: 51622A (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000031010
TVR: 8080008000
TSI: 6800
AC: 56C2AA9C60978C57
ARC: 00

Receipt ID 82385453168981888671 002 Items
CSH: Sydney Tran: 0306 Reg: 002

Appr Code: 51622A (I) Sale
VISA CREDIT 84.14

Customer Signature

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